

February 12, 2020

Federal Communications Commission
445 12th Street SW
Washington DC 20554

**RE: In the Matter of Implementation of the National Suicide Hotline Improvement Act of 2018
(WC Docket No. 18-336) Notice of Proposed Rulemaking Released: Dec. 16, 2019**

I am filing this comment in response to the above-captioned NPRM concerning the use of 988 as a 3-digit-telephone dialing code for people experiencing mental health crises and how this proposal should account for the fact that individuals increasingly rely on text to communicate.

As the founder and president of the Data & Society Research Institute, a current Partner Researcher at Microsoft Research, a Visiting Professor at New York University, and a member of the advisory board of the Electronic Privacy Information Center, I have unique expertise regarding the intersectionality of technological, social, ethical, data science, legal, and public policy concerns implicated in today's interconnected world. For the last 15 years, I have written and spoken extensively to academic and laypeople concerning online privacy, socioeconomic disparities amongst social media platform users, and the effects of "big data" on our society.

As a board member of Crisis Text Line since 2012, I've seen the organization grow and embody the hallmark values of protecting user privacy, prioritizing diversity and inclusion, and using the awesome power of technology -- including machine learning and data analytics -- for good in innovative new ways. The organization uses innovations in technology and data both to save lives and to inform the public regarding mental health issues, including by triaging conversations based upon their risk of suicidality with the help of machine learning algorithms. The organization further collaborates with leading universities on academic research, shares detailed localized aggregated crisis data to inform public policy decisions, and publishes statistical data on their Crisis Trends website. In short, Crisis Text Line is a prime example of using tech, data, and machine learning for social good.

Here, as the government establishes 988 as a three-digit-dialing code for the National Suicide Prevention Lifeline, the government should leverage existing text services like Crisis Text Line that are already providing a valuable service to the public at no cost to the

taxpayers. The magnitude of the suicide epidemic requires us to coordinate and use resources efficiently. Having a duplicative government-run text line could confuse those who are in crises. Furthermore, it will lead to fragmentation of data -- potentially weakening the insights that can be gleaned from the data for policymakers and the public.

In conclusion, based on my experience as an academic researcher, professor, social advocate, and a board member of Crisis Text Line, I recommend that the government leverages Crisis Text Line to help support texters in crisis, rather than trying to duplicate their efforts. Relying on existing leaders like Crisis Text Line would use the resources and experience of a sectoral leader with exceptional data analytics capabilities and privacy protections to help save lives -- an opportunity that the government must not pass up. Crisis Text Line would be proud to work together collaboratively as 988 is implemented, to save lives via text message in a safe, smart, and cost-efficient way, with the innovation and speed of a private tech company acting in the public interest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Danah Boyd', with a stylized, cursive script.

Dr. danah boyd

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